



BAY AREA AIR POLLUTION CONTROL DISTRICT

INSTITUTE OF GOVERNMENTAL
STUDIES LIBRARY

APR 19 1978

13th April, 1978

UNIVERSITY OF CALIFORNIA

TO: All Interested Persons

FROM: Air Pollution Control Officer

SUBJECT: Public Hearings on:

- 1) SO₂ limits from acid plants and sulfur plants
- 2) Polyester resins - Organic Emissions

Regulations 2 and 3

ALAMEDA COUNTY

Fred F. Cooper
Richard Oliver
(Secretary)
Charles Santana
Helen Tirsell

CONTRA COSTA COUNTY

James P. Kenny
Elwon Lance

MARIN COUNTY

Barbara Boxer

NAPA COUNTY

Sam Chapman
(Chairperson)

SAN FRANCISCO COUNTY

Quentin Kopp
John L. Molinari

SAN MATEO COUNTY

Edward J. Bacciocco, Jr.
Marguerite Leipzig

SANTA CLARA COUNTY

Ralph P. Doetsch, Sr.
Ruth Koehler
Daniel A. McCorquodale
(Vice Chairperson)
Geraldine F. Steinberg

SOLANO COUNTY

James Lemos

SONOMA COUNTY

Gerald M. Poznanovich

On May 17, 1978 the Board of Directors will be holding a public hearing to consider adopting amendments to the district regulations in two areas:

The first will be to consider a proposal to reduce the emission of SO₂ from acid plants and sulfur plants in the district. Basically, the proposed amendment would limit SO₂ emission from acid plants to 300 ppm and no more than 7 pounds of SO₂ per ton of acid produced. The limit for sulfur plants would be 300 ppm and no more than 5 pounds of SO₂ per ton of sulfur produced. Time for compliance would be 3 years from the date of adoption.

The second proposal will amend Regulation 3 to exclude the use of polyester resins from the limits of organic emissions established in the Regulation. It sets a new limit on the emission of organic gases from these operations.

Copies of both proposed amendments are attached. Your comments would be of assistance to the Board in their consideration of these proposals.

PROPOSED AMENDMENTS TO REGULATION 2§ 3120 SULFUR DIOXIDE

§ 3121 No person shall cause, let, permit, suffer or allow any emission of sulfur dioxide from sources other than ships which results in ground level concentrations of sulfur dioxide at any given point in excess of 0.5 ppm (vol) for 3 consecutive minutes or 0.5 ppm (vol) averaged over 60 consecutive minutes, or 0.04 ppm (vol) averaged over 24 hours, or any of the limits specified in Table 1. § 3121 shall not apply to the ground level concentrations occurring on the property from which such emission occurs, provided such property, from the emission point to the point of any such concentration, is controlled by the person responsible for such emission. (*Amended by Resolution 834, dated March 21, 1974.*)

§ 3122 Except as provided in § 3123, no person shall cause, let, permit, suffer, or allow the emission of gas containing sulfur dioxide from sources other than ships in excess of 300 ppm (vol). No person shall cause, let, permit, suffer, or allow the emission from a ship of gas containing sulfur dioxide in excess of 2000 ppm (vol) except when the ship is entering port from outside the District. All sampling of exhaust gases shall follow the techniques prescribed in Chapter 2, Division 8. For purposes of this section 3122, all sulfur present in gaseous compounds containing oxygen shall be deemed to be present as sulfur dioxide, and analyses of samples taken to determine the amount of sulfur dioxide in exhaust gases shall be made as specified in Chapter 1, Division 9. Tests for determining compliance with this section 3122 shall be for not less than 15 consecutive minutes or 90% of the time of actual source operation, whichever is less. (*Amended by Resolution 835, dated March 21, 1974; amended March 17, 1976.*)

§ 3123 Emissions exceeding the limits established in § 3122 shall not constitute a violation of that section provided that all requirements of this Section 3123, to wit, §§ 3123.1 through 3123.9, inclusive, are satisfied; provided, however, that emissions which exceed 200 pounds of sulfur dioxide per day shall not in any event exceed a maximum emission concentration of 1,000 ppm (by volume) of sulfur dioxide, averaged over a 24 hour 1 period. (*Amended November 3, 1976.*)

AND FURTHER PROVIDED THAT:

- a) EMISSIONS OF SO₂ FROM SULFURIC ACID PLANTS SHALL NOT IN ANY EVENT EXCEED A MAXIMUM EMISSION CONCENTRATION OF 300 PPM (BY VOLUME) AVERAGED OVER A 1 HOUR PERIOD, AND NOT EXCEED AN EMISSION OF MORE THAN 7 POUNDS OF SO₂ PER SHORT TON OF ACID PRODUCED, EXPRESSED AS 100% SULFURIC ACID, AND

b) EMISSIONS OF SO₂ FROM SULFUR PLANTS SHALL NOT IN ANY EVENT EXCEED A MAXIMUM EMISSION CONCENTRATION OF 300 PPM (BY VOLUME) AVERAGED OVER A 1 HOUR PERIOD, AND NOT EXCEED AN EMISSION OF MORE THAN 5 POUNDS PER SHORT TON OF SULFUR PRODUCED.

c) PERSONS SUBJECT TO THE REQUIREMENTS OF SECTIONS 3123 a) OR b) SHALL COMPLY WITH THE FOLLOWING COMPLIANCE SCHEDULE:

1. ON OR BEFORE JULY 1, 1979 SUBMIT TO THE APCO PLANS AND SPECIFICATIONS SHOWING HOW THE EMISSION LIMITS ARE TO BE MET.
2. ON OR BEFORE JULY 1, 1980 SUBMIT APPLICATIONS TO THE APCO FOR AUTHORITIES TO CONSTRUCT THE NECESSARY MODIFICATIONS REQUIRED TO MEET THE EMISSION LIMITS REQUIRED UNDER SECTIONS 3123 a) OR b).
3. ON OR BEFORE JULY 1, 1981 COMPLETE CONSTRUCTION OF THE NECESSARY MODIFICATIONS REQUIRED TO MEET THE EMISSION LIMITS REQUIRED UNDER SECTIONS 3123 a) OR b).

d) PERSONS SUBJECT TO THE REQUIREMENTS OF SECTIONS 3123 a) OR b) WHO INSTALLED CONTROL EQUIPMENT ON SULFURIC ACID PLANTS OR SULFUR RECOVERY UNITS PRIOR TO JULY 1, 1977 SHALL BE ALLOWED A 7 YEAR AMORTIZATION TIME FROM THE DATE OF ISSUANCE OF A PERMIT TO OPERATE FOR SUCH CONSTRUCTION BEFORE COMPLYING WITH THE REQUIREMENTS OF SECTION 3123 c). THE COMPLIANCE SCHEDULES SHALL BE ADJUSTED FOR SUCH PERSONS TO ALLOW A 7 YEAR AMORTIZATION TIME FOR COMPLETION OF THE CONSTRUCTION OF THE NECESSARY MODIFICATIONS REQUIRED TO MEET THE EMISSION LIMITS REQUIRED UNDER SECTIONS 3123 a) OR b).

§ 3123.1 Such emissions shall not result in ground-level concentrations of sulfur dioxide exceeding the limits established by § 3121.

§ 3123.2 The person responsible for such emissions shall have notified the control officer in writing, prior to such emission, of his intent to operate under the provisions of § 3123. Such notice shall include information as to the location of all significant emission points, the location of



C123309596

PROPOSED AMENDMENTS TO REGULATION 3Add to Chapter 2 - Exclusions from Application of this Regulation

1200 This Regulation does not apply to emissions arising from the source operations listed in Sections 1201 to ~~1219~~ 1220.

Add New Section

1220 THE USE OF ANY POLYESTER RESIN IN ANY REINFORCED PLASTIC MANUFACTURING PROCESS IF SUCH USE, AFTER APPLICATION, DOES NOT RESULT IN THE EMISSION OF ORGANIC GASES IN EXCESS OF 12% BY WEIGHT OF SUCH POLYESTER RESIN. AFTER JANUARY 1, 1982 THE EMISSION OF ORGANIC GASES SHALL NOT EXCEED 6% BY WEIGHT OF SAID POLYESTER RESIN.